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10 *Attorneys for National Collegiate Student Loan Trust ("NCSLT") aka National Collegiate*
11 *Master Student Loan Trust I, NCSLT 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1,*
12 *NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-4,*
13 *NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and NCSLT 2007-4*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Richard Klein and Raymond Urias, individually
and on behalf of all others similarly situated,

Plaintiffs,
vs.

National Collegiate Student Loan Trust aka
National Collegiate Master Student Loan Trust
I, National Collegiate Student Loan Trust 2003-
1, National Collegiate Student Loan Trust 2004-
1, National Collegiate Student Loan Trust 2004-
2, National Collegiate Student Loan Trust 2005-
1, National Collegiate Student Loan Trust 2005-
2, National Collegiate Student Loan Trust 2005-
3, National Collegiate Student Loan Trust 2006-
1, National Collegiate Student Loan Trust 2006-
2, National Collegiate Student Loan Trust 2006-
3, National Collegiate Student Loan Trust 2006-
4, National Collegiate Student Loan Trust 2007-
1, National Collegiate Student Loan Trust 2007-
2, National Collegiate Student Loan Trust 2007-
3, and National Collegiate Student Loan Trust
2007-4,

Defendants.

Case No.: 2:22-cv-01392-GMN-BNW

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (FIRST
REQUEST)**

Plaintiffs, Richard Klein and Raymond Urias ("Plaintiffs"), and Defendants, National
Collegiate Student Loan Trust ("NCSLT") aka National Collegiate Master Student Loan Trust I,

1 NCSLT 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1, NCSLT 2005-2, NCSLT 2005-
2 3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-4, NCSLT 2007-1, NCSLT
3 2007-2, NCSLT 2007-3, and NCSLT 2007-4 (“Defendants”) (collectively “Parties”), by and
4 through their counsel of record, hereby stipulate and agree as follows:

5 On August 26, 2022, Plaintiffs filed their Complaint [ECF No. 1]. Defendants were served
6 with Plaintiffs’ Complaint on September 19, 2022. The deadline for Defendants to respond to
7 Plaintiffs’ Complaint is October 11, 2022. The Parties have discussed extending the deadline for
8 Defendants to respond to Plaintiffs’ Complaint to allow for better investigation of the allegations
9 and discuss possible resolution of the matter.

10 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants
11 to file their responsive pleading to Plaintiffs’ Complaint to November 9, 2022.

12 This is the first motion for an extension of time for Defendants to file their responsive
13 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
14 any other party.

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As part of this motion, Defendants agree to participate in any Rule 26(f) conference that occurs during the pendency of this extension.

DATED this 5th day of October, 2022.

WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

/s/ Ramir M. Hernandez

/s/ Gerardo Avalos

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Collegiate Student Loan Trust ("NCSLT")
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Trust I, NCSLT 2003-1, NCSLT 2004-1,
NCSLT 2004-2, NCSLT 2005-1, NCSLT
2005-2, NCSLT 2005-3, NCSLT 2006-1,
NCSLT 2006-2, NCSLT 2006-3, NCSLT
2006-4, NCSLT 2007-1, NCSLT 2007-2,
NCSLT 2007-3, and NCSLT 2007-4*

Gerardo Avalos, Esq.
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8985 S. Eastern Ave. Suite 350
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*Attorneys for Plaintiffs, Richard Klein and
Raymond Urias*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: October 6, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 5th day of October, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP